



FACILITY COMPLIANCE INSPECTION REPORT

Division of Waste Management

Solid Waste Section

UNIT TYPE:

Lined MSWLF		LCID		YW		Transfer		Compost		SLAS		COUNTY: Forsyth PERMIT NO.: 34-20 FILE TYPE: COMPLIANCE
Closed MSWLF		HHW		White goods		Incineration		T&P		FIRM		
CDFL		Tire T&P / Collection		Tire Monofill		Industrial Landfill	X	DEMO		SDTF		

Date of Site Inspection: July 9, 2014

Date of Last Inspection: April 25, 2013

FACILITY NAME AND ADDRESS:

Atlantic Scrap and Processing, LLC – Auto Shredder Residue (ASR) Reclamation Operation
1426 West Mountain Street
Kernersville, North Carolina 27284

GPS COORDINATES: N: 36.14131 W: 80.10312

FACILITY CONTACT NAME AND PHONE NUMBER:

Name: Bill Perry, Regional Manager
Telephone: (336) 996-2350
Email address: bperry@omnisource.com
Fax: (336) 996-0493

FACILITY CONTACT ADDRESS:

OmniSource Southeast, LLC – Kernersville Plant
Attn: Bill Perry, Regional Manager
Post office Box 608
Kernersville, North Carolina 27285

PARTICIPANTS:

Brad Floyd, Production Manager
Doug Thornhill, Operations Manager w/ Second Pass
Charles Gerstell, NCDENR-Solid Waste Section
John Murray, NCDENR-Solid Waste Section

STATUS OF PERMIT:

A Permit to Operate an Auto Shredder Residue (ASR) Reclamation Operation was issued to Atlantic Scrap and Processing, LLC on September 2, 2005. This permit expired on September 2, 2008. A permit extension request letter was submitted to the Solid Waste Section on March 5, 2008. A Permit to Operate Renewal Application was received by the Solid Waste Section on May 27, 2014 and is currently under review.

PURPOSE OF SITE VISIT:

Comprehensive Inspection

STATUS OF PAST NOTED VIOLATIONS:

N/A

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OBSERVED VIOLATIONS

None

The item(s) listed above were observed by Section staff and require action on behalf of the facility in order to come into or maintain compliance with the Statutes, Rules, and/or other regulatory requirements applicable to this facility. Be advised that pursuant to N.C.G.S. 130A-22, an administrative penalty of up to \$15,000 per day may be assessed for each violation of the Solid Waste Laws, Regulations, Conditions of a Permit, or Order under Article 9 of Chapter 130A of the N.C. General Statutes. Further, the facility and/or all responsible parties may also be subject to enforcement actions including penalties, injunction from operation of a solid waste management facility or a solid waste collection service and any such further relief as may be necessary to achieve compliance with the North Carolina Solid Waste Management Act and Rules.

ADDITIONAL COMMENTS

1. Atlantic Scrap and Processing, LLC has been acquired by OmniSource Southeast and now operates the facility as OmniSource Southeast – Kenersville Plant.
2. The facility is permitted to operate an auto shredder residue (ASR) reclamation operation that segregates ferrous and non-ferrous, and different constituents of non-ferrous, metals from ASR. A closed industrial/ASR landfill is located at the OmniSource Southeast LLC - Kenersville Plant. A three-story ASR scrap metal sorting operation has been constructed and is owned by Second Pass LLC along with machinery used for material handling.
3. The operations plan and permit were reviewed. Both documents were current.
4. The Second Pass scrap metal sorting operation is composed of two independent metal sorting lines. Each sorting line can run mined ASR or newly derived ASR.
 - A secondary Second Pass scrap metal sorting operation is also used to process mined ASR. This system sorts 19 millimeter and smaller fines from the primary Second Pass operation.
5. Mined ASR is exclusively sorted by the Second Pass metal sorting operation. Waste resulting from the processing of mined ASR is placed back into the ASR landfill. Waste from newly derived ASR is collected and shipped-out to Allied Waste Charlotte Motor Speedway Landfill (permit No. 13-04). The permit does not authorize the disposal of newly processed ASR or any other newly derived solid waste back into the facility's industrial/ASR landfill.
6. Excavation of ASR material was progressing from west to east at the time of inspection.
7. Waste residues are placed in a large stockpile located at the southwest corner of the landfill. It appeared that
8. Benching of the excavation area was observed as detailed in the approved Operational Plan for the facility.
9. ASR material was observed in the sediment basin located at the toe of the slope near the northwest corner of the site. It appeared that this material had been washed into the three slope drains that deposit into the sediment trap from the excavated area above.
 - A rip rap and gravel rock dam was observed below the sediment trap. It appeared that any residuals washed into the sediment trap were unable to bypass the rock dam.
 - All ASR material must be returned to the landfill.
 - **Steps must be taken to ensure that all ASR material remains within the footprint of the landfill.**
10. An area of bare soil with exposed ASR material was observed at the top of the exterior slope just beyond the active recovery activities on the north side of the landfill east of the sediment trap. **All exposed residue beyond the active recovery activities must be covered with soil and stabilized with a groundcover sufficient to restrain erosion.**

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11. During the previous inspection, a severe slope failure was observed on the northeast side of the landfill near the base of the slope.

- Per recommendations by the Permitting Branch, a slope stability analysis was requested to be submitted for the outside slope of the landfill to determine what actions were needed to repair the slope. All submittals were directed to be submitted to:

John Murray, Permitting Engineer
DWM/Solid Waste Section
610 East Center Avenue, Suite 301
Mooresville, North Carolina 28115

- Inspection of the slope could not be performed during the July 9th inspection due to the steepness of slope and vegetative overgrowth. Mr. Floyd could not confirm if any work had been performed on the slope. However, he explained that a consultant was working on a plan to address the slope.
- During a phone conversation on July 16, 2014, Mr. James Winegar stated that plans were to address the slope condition once excavation activities reached the area of concern.
- **Upon consulting with Mr. Murray, proposed corrective actions associated with the slope failure will be addressed in the permit renewal process.**

12. During the inspection, water from within the landfill was observed entering one of the slope drains on the north side of the site leading to the sediment trap located at the toe of the slope. The landfill has also been graded at the southwest portion of the landfill in a manner that directs flow into a diversion ditch leading to a retaining area with no apparent outlet on west side of the landfill.

- The operational plan for the facility states: *"In each area to be excavated, a barrier will always be left in place to isolate the active excavation from surface streams. Any precipitation falling in the pit will remain in the pit."*
- **Water entering the slope drains or the retaining area beyond the footprint of the landfill does not appear to comply with the requirements detailed in the operational plan.**
- **Please take steps to comply with the operational plan and prevent water from leaving the landfill area. Any changes to the operational plan must be referred to John Murray, Permitting Engineer.**

13. Processed residues (mined ASR) were being stockpiled on the southeast portion of the landfill at the time of inspection. It appeared that all residues were maintained within the footprint of the landfill as required by the operational plan.

14. Reclaimed product/collected scrap metal was being stored in piles located on concrete pads or under roof.

15. The facility is secured by a gate at the entrance to the facility to prevent unauthorized entry.

16. This facility was placed under Notice of Violation on September 2, 2011 for violations of 15A NCAC 13B .0510(c) and 15A NCAC 2L .0106(d)(2). The Notice of Violation has since been resolved as detailed by letter dated June 21, 2013 from Jaclynne Drummond, Compliance Hydrogeologist.

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Please contact me if you have any questions or concerns regarding this inspection report.



Charles T. Gerstell
Environmental Senior Specialist
Regional Representative

Phone: (704) 235-2144

Sent on: <u>7/16/14</u>	<input checked="" type="checkbox"/>	Email	<input type="checkbox"/>	Hand delivery	<input type="checkbox"/>	US Mail	<input type="checkbox"/>	Certified No. <input type="checkbox"/>
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Copies: Jason Watkins, Western District Supervisor
Sarah Rice, Compliance Officer
John Murray, Regional Engineer
James Winegar, Environmental Manager OmniSource Southeast